

Shorter, Chere

From: szamani@newmansownorganics.com%inter2 [szamani@newmansownorganics.com] on behalf of szamani@newmansownorganics.com
Sent: Monday, December 13, 2004 2:04 PM
To: Shorter, Chere
Subject: Newman's Own Organics - Olive Oil

Chere L. Shorter
USDA
1400 Independence Ave., SW
Room 0709, South Building
Stop 0247
Washington, DC 20250

Dear Ms. Shorter,
Newman's Own Organics has been purchasing olive oil from National Food Trading Corporation for over 1 ½ years. National Food Trading Corporation is a member of the North American Olive Oil Association, which has, since its inception, required its members to follow the International Olive Oil Council standard.

We urge the USDA to update the standard for olive oil to match the IOOC standard. In its cover note accompanying the petition, the California Olive Oil Council mentions it has deleted any reference to a value for linolenic acid, pending the results of a review of the correct fatty acid limits for linolenic acid. We support the exclusion of a reference to linolenic acid, provided the standard will be updated immediately upon completion of the study.

Though the NAOOA's testing results show consumers can be confident what they buy in supermarkets is correctly labeled, the lack of an up-to-date standard creates the opportunity for unscrupulous companies to produce or sell inferior product. We support updating the standard to eliminate that opportunity.

With regard to the organoleptic testing requirements, in order to ensure integrity, we would request USDA create a panel of USDA employees that would be certified by the IOOC to perform organoleptic analyses. For the chemical testing, we request USDA create a lab or accredit one or more labs that would perform the analyses following IOOC technical standards. It would be necessary in both chemical and organoleptic testing to use coded samples as opposed to product labeled with brand names to avoid any claims of bias.

We appreciate the opportunity to provide comments.

Sincerely,

Sarah Zamani
Director of Customer Relations
Newman's Own Organics

cc: Peter Meehan
Nell Newman
Paul Newman

12/14/2004